

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

DYNCORP INTERNATIONAL LLC,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES,)	
)	No. 19-1133C
Defendant,)	(Senior Judge Smith)
)	
and)	
)	
KELLOGG, BROWN & ROOT)	
SERVICES, INC.,)	
VECTRUS SYSTEMS CORPORATION,)	
FLUOR INTERCONTINENTAL, INC.,)	
and PAE-PARSONS GLOBAL)	
LOGISTICS SERVICES, LLC,)	
)	
Defendant-Intervenors.)	

**DEFENDANT'S UNOPPOSED MOTION
TO AMEND THE ADMINISTRATIVE RECORD**

Defendant, the United States, respectfully requests leave to amend the administrative record. Counsel for plaintiff and each of the intervenors have indicated that they do not oppose this motion. Since filing the administrative record, we have discovered that certain documents were inadvertently omitted. Specifically:

- Tabs 55-7, 61-9, and 62-11, are memorandums that reference certain attachments that were included in the first Final Proposal Revision submitted by Fluor Intercontinental, Inc. *See* Tab 55-7 at AR 23200; Tab 61-9 at AR 28692; Tab 62-11 at AR 29567; Tab 591 at AR 540029, 542138, 547369. The attachments were

not included in the agency report before the Government Accountability Office (GAO) and were inadvertently omitted from Tab 591 in the administrative record before this Court. We have attached the omitted documents as new Tabs 838, 840, and 841, per the attached amended index.¹

- Tab 56-8 was submitted to the GAO as a pdf portfolio that include two e-mails with attachments. In converting this file to a regular pdf file for the administrative record, we inadvertently included only one of the e-mails and one of the attachments to that e-mail is incomplete. We have attached a corrected Tab 56-8 as a new Tab 839.
- The Cost Reimbursable Pricing Proposal for the United States Northern Command (NORTHCOM) contained in the first Final Proposal Revision for DynCorp International LLC was inadvertently omitted from Tab 646, and it was not included in the agency report before the GAO. We have attached the omitted document as a new Tab 842.²

Also, as we indicated in our notice of filing the administrative record, we were unable to fully Bates number some of the larger documents in the administrative record. We have since been able to complete the Bates numbering process, and seek leave to file the corrected documents on DVD (Tabs 525, 528, 548, 562, 582g, 582h, 584, 605, and 639e). Each of these documents is at least six times larger than the Court's electronic filing system's 50 megabyte

¹ In addition to adding the new documents, the amended index also contains other minor corrections.

² The omitted documents were provided to counsel for the other parties last week (without Bates numbers).

limit for individual files, with one file more than 30 times larger. Attempting to file these documents on the Court's electronic filing system would be unduly burdensome for the Government and would unnecessarily delay the filing.

For these reasons, we respectfully request that the Court grant this unopposed motion to amend the administrative record.

Respectfully submitted,

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